LESCOUET et al. Appl. No. 10/665,352

March 12, 2008

**AMENDMENTS TO THE DRAWINGS** 

A copy of marked-up drawing sheets for Figures 7, 8, 9a and 9b together with

corresponding replacement sheets is attached. These were originally filed with the amendment

of July 26, 2007 -- but apparently not entered because the Examiner has objected to "areas of

shading" on these sheets in the final action of 10/12/2007.

Therefore, please confirm that all previously requested drawing amendments have been

entered.

Attachment: Replacement Sheet(s)

Annotated Sheet Showing Changes

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## **REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

The Examiner's objection to shading in Figures 7, 8, 9a and 9b is not understood.

Drawing amendments requested on July 26, 2007 have <u>already</u> eliminated all shading from these drawing sheets. If there is any remaining formality-based objection, it is requested that the undersigned be telephoned as soon as possible so that such can be swiftly obviated.

The rejection of claims 1-31 under 35 U.S.C. §103 as allegedly being made "obvious" based on Ohno EP '536 in view of Solomon '409 is respectfully traversed.

The Examiner admits that Ohno fails to teach any of the last two paragraphs of independent claims 1, 25, 27 and 28 (i.e., substantially all of the substantive amendment to the claims added July 26, 2007).

For this admitted deficiency, the Examiner relies upon newly cited Solomon. However, as will be explained in more detail below, it is respectfully submitted that Solomon <u>also</u> suffers from at least the same deficiencies as Ohno.

In Solomon, all interrupts are trapped by the UNIX operating system 506 (Figure 5). The UNIX operating system then decides whether the interrupt is intended for a device in the Windows NT operating system 508. If so, the UNIX operating system 506 reports the interrupt to the Windows NT operating system 508. See column 4, lines 36 to 48.

Contrary to the Examiner's allegations, Solomon does not disclose a common program (i.e., the UNIX OS itself cannot qualify as such). Solomon does not disclose a common program arranged to pass interrupts intended for the first second operating systems to the frist operating system -- a first operating system arranged to pass interrupts intended for the second operating

system back to the common program. Solomon does not teach (or suggest) any program object having both these required characteristics for the claimed "common program".

Therefore, even if Ono (or some selected part of Ohno) is combined with Solomon (or some selected part of Solomon), this still does not provide the claimed invention.

There are various advantages associated with the above features. For example, by employing a common program in accordance with the present invention, each operating system may ignore the other(s) running alongside it and only communicate with the common program which brokers access to the drivers of the critical operating system (see page 5, lines 5-9 of the specification). This provides a more secure architecture, as is described in detail in the last paragraph or description page 37. That is, the second operating system is insulated from the first operating system as well as specified system resources and accesses them only through the common program (which is operable as a hardware resource dispatcher). This is in contrast to Solomon where no such common program is provided.

Nevertheless, according to the present invention, the first operating system retains control of its interrupt handling. That is, the first operating system <u>always</u> has <u>first access to all</u> <u>interrupts</u>. This is another important feature of the applicant's secure architecture and has he advantage that the first operating system <u>itself</u> can insure that it performs without disturbance. This is in contrast to Ohno, where this depends on an external agent, namely the inter-operating control system, which decides how to process interrupts.

Ohno and Solomon, even if combined, do not suggest providing a common program to receive all interrupts and still have the first operating system handle all interrupts. Ohno and Solomon teach either using a common interrupt handler to handle all interrupts (Ohno), or to

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omit the common interrupt handler and have the first operating system handle all interrupts

(Solomon). There is no suggestion whatsoever -- other than based on the impermissible benefit

of hindsight -- to retain the common interrupt handles, and to modify it to forward all interrupts

to the first operating system.

Given such fundamental deficiencies of both the cited references (whether considered

singly or in combination), it is not believed necessary at this time to discuss additional

deficiencies of this allegedly "obvious" combination of references with respect to other features

of the rejected claims.

Accordingly, this entire application is now believed to be in allowable condition and a

formal Notice to that effect is respectfully solicited.

Respectfully submitted,

**NIXON & VANDERHYE P.C.** 

LSN:vc

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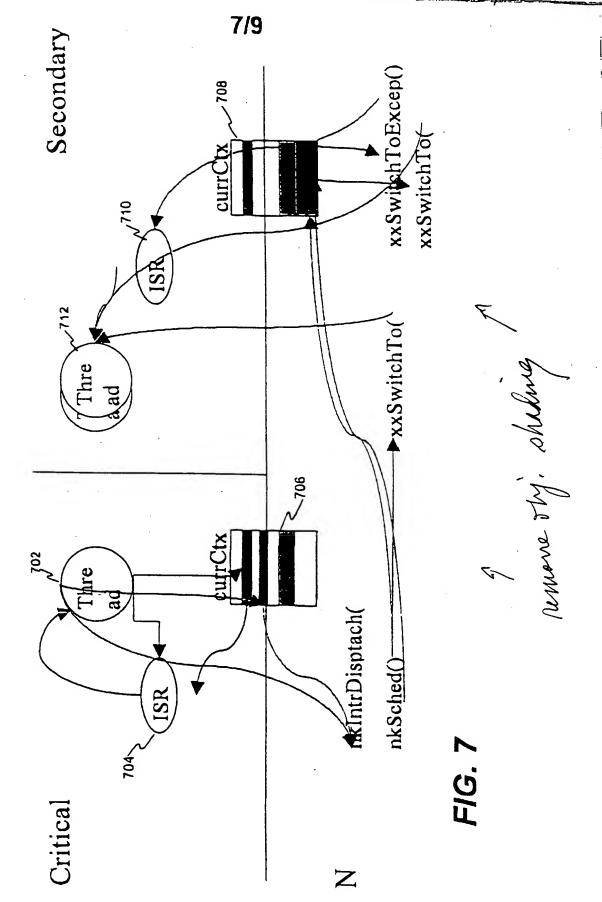
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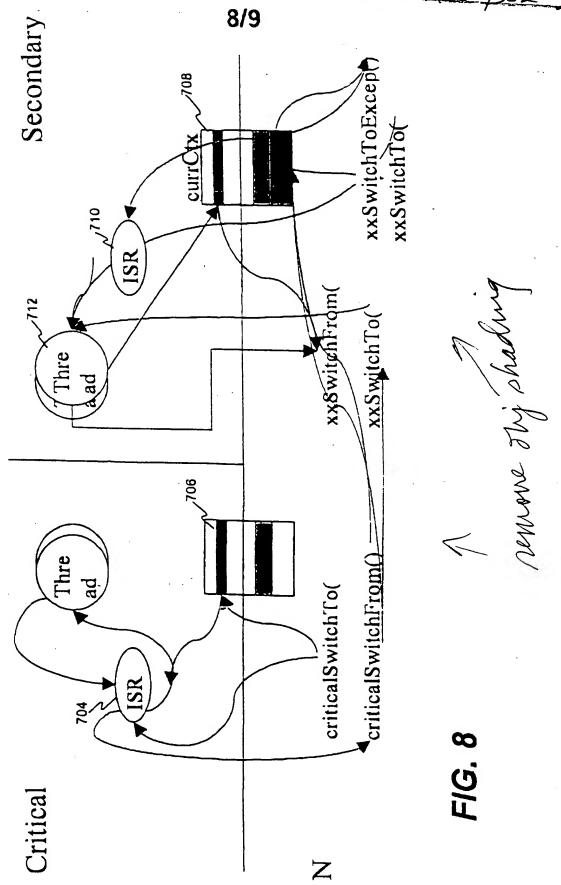
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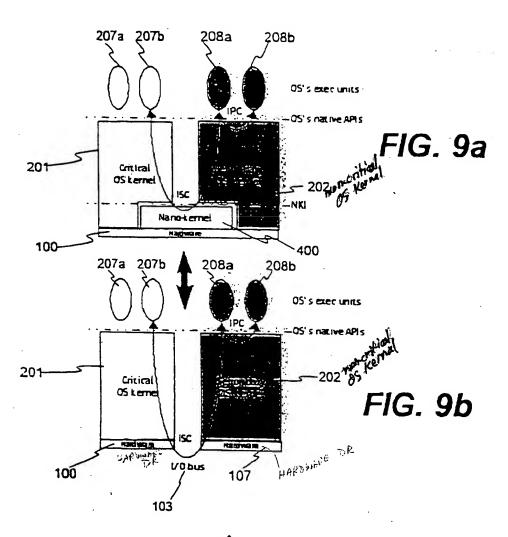
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